

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ARCHIT BASKARAN, et al.,	)	
	)	
Plaintiffs,	)	Case No. 1:23-cv-02243
	)	
v.	)	Judge John Robert Blakey
	)	Magistrate Judge Jeffrey T. Gilbert
CHICAGO POLICE OFFICER SHANE	)	
COLEMAN (#15359), et al.,	)	
	)	JURY DEMAND
Defendants.	)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE  
INSTANTER AMENDED COMPLAINT**

Plaintiffs, by their undersigned attorneys, file this motion for leave to file instanter their Amended Complaint.

1. Plaintiffs’ claims were initially filed as part of *Protesters in Support of Black Lives v. City of Chicago*, 20-cv-6851 (the “Original Action”), which included 60 plaintiffs and dozens of officer defendants plus the City of Chicago and former Superintendent Brown.
2. Pursuant to Judge Johnson Coleman’s order dated April 6, 2023, that matter was severed into fifteen separate cases, including this matter before the Court.
3. Defendants were served when Plaintiffs’ claims were still a part of the Original Action.
4. The Complaint that appears on the docket in this case was the first Complaint that the plaintiffs in the Original Action filed and contains allegations related to all 60 original plaintiffs.
5. Plaintiffs seek leave to file an amended complaint limited to Plaintiffs’ claims.

6. Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiffs have requested and received written consent from Defendants to amend their complaint.

7. Plaintiffs, therefore, seek leave to file instant their Amended Complaint which is attached hereto as Exhibit A.

8. The Amended Complaint utilizes Plaintiff Pfeifer's current legal name, which was changed after the Original Action was filed. Plaintiffs' Unopposed Notice of Party Name Change and Motion to Restyle Case Caption is currently pending. (Dkt. 21)

Dated: April 10, 2024

Respectfully submitted,

/s/ Nora Snyder

Nora Snyder

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Ben H. Elson, Hakeem Muhammad

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